

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**DECLARATION OF CHRISTINA LORENZEN IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

I, Christina Lorenzen, declare the following under penalty of perjury:

1. I am over the age of eighteen and I am competent to make this declaration.
2. I respectfully submit this declaration in support of Plaintiffs' Motion for Class Certification. Each of the facts set forth below are true and correct and are within my personal knowledge. If called and sworn as a witness, I would competently testify thereto. As to matters of opinion and belief, I believe them to be true and accurate.
3. I am a resident of the State of Colorado.
4. I graduated from Colorado State University with a Bachelor of Science in Math. I also earned a Master of Science degree in Computer Information Systems.
5. My daughter participated in the sport of competitive cheerleading from 2019-2020 on a team run through her high school. As a member of the team, she participated in both regular and end-of-season school cheerleading competitions during the years of 2019-2022,

including school cheerleading competitions run by the United Cheerleading Association (UCA) and NFHS

6. In 2020, my daughter's team earned a qualifying bid to the NFHS Nationals Championship in Orlando, Florida, and traveled to that event. My daughter's team stayed at a Disney hotel with the team. I traveled separately from the team to this competition and paid a spectator fee to watch the event in the amount of \$40.

7. From approximately 2019-2020 my daughter's school cheer team was required to attend weekly tumbling lessons at an All-Star gym named Cheer Central Suns. It was mandatory for our school cheer team members to attend. I paid \$580 for my daughter to attend this program. The Cheer Central Suns gym was approximately 30 miles away from my home, and my daughter attended tumbling training on a weekly basis. My understanding of the purpose of attending the program at Cheer Central Suns was so that the team might be able to qualify for a different division at Varsity competitions. In another instance, my daughter's team did go to a summer camp, but it fell on a week that my daughter was slated to visit her father under a custody agreement, so she was unable to attend. I did not pay for that particular camp, but the team still attended that camp.

8. Between the years 2019-2022, I purchased cheerleading apparel from Varsity.

9. I have never been a plaintiff in a class action lawsuit before deciding to serve as the proposed class representative in this case.

10. I am not being paid anything to be a named plaintiff, nor do I expect to receive anything in return for being a named plaintiff, nor have I been promised anything to serve as a named plaintiff. My main goal in serving as a class representative is only to serve the class and to seek the best possible result for all class members.

11. I am fully committed to the prosecution of this case, and will testify at trial, if necessary.

12. I reviewed the Complaint before it was filed. I also provided information to my attorneys to aid with the investigation of the case prior to filing the Complaint.

13. I provided my files and data to my attorneys to comply fully with discovery in this matter. It is my understanding that my counsel provided the responsive information to Defendants. I also reviewed the responses my counsel provided on my behalf to Defendants in response to Defendants' requests for documents and interrogatories.

14. I understand that as a class representative, I may be responsible for participating in giving notice to the classes if the class is certified and/or if there is a settlement or judgment and am willing to do so.

15. On January 20, 2022, I was deposed via Zoom by Defendants, and fully cooperated with my responsibilities in giving my testimony. I estimate that I spent 20 hours preparing for and sitting for my deposition.

16. I reviewed the accompanying motion for class certification.

17. I have hired competent counsel and seek nothing other than to further the best interests of the class, and fully willing to give my time and energy to do so through resolution.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 10, 2023 in Berthoud, Colorado.

/s/ Christina Lorenzen
Christina Lorenzen

SIGNATURE ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 10, 2023 in San Francisco, California.

By: /s/ Joseph R. Saveri

Joseph R. Saveri